

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 2:18-cr-116-MHT-WC
	)	
G. FORD GILBERT	)	

**GOVERNMENT’S MOTION TO MODIFY**  
**CONDITIONS OF PRETRIAL RELEASE**

COMES NOW the United States of America, by and through Louis V. Franklin, Sr., United States Attorney for the Middle District of Alabama, and requests the Court modify the conditions of the defendant’s pretrial release, and as grounds states as follows:

1. Title 18 U.S.C. § 3142(c)(1)(B) states a judicial officer shall order the pretrial release of [a] person “subject to the least restrictive ... conditions” to ensure the appearance of the defendant as required and to set “any other condition that is reasonable necessary to assure the appearance of the person as required and to assure the safety of the community.” Title 18 U.S.C. § 3142(c)(1)(B)(xiv).

2. On or about May 10, 1999, a final judgment was entered against the defendant in the United States District Court for the District of Columbia in the amount of \$100,000.00. (*See Exhibit 1, Final Judgment as to Gregory Gilbert – filed under seal*). Based on information and belief, the debt is still outstanding.

3. On or about September 20, 2018, the United States Attorney’s Office for the Middle District of Alabama received information that defendant Gilbert was soliciting millions of dollars from a Dutch citizen to invest in an alleged diabetes treatment center. (*See Exhibit 2, Communication from Timothy J. Galligan, Esq. – filed under seal*).

4. Pretrial Services was advised of these facts by the United States Postal Inspection Service. Thereafter, Pretrial Services contacted the defendant's counsel seeking the defendant's voluntary submission to the modifications requested herein. The defendant, through counsel, would not agree to same.

5. Given the above, the government requests this Court modify the conditions of the defendant's pretrial supervision by: 1) prohibiting defendant Gilbert from acquiring or attempting to acquire any further debt or opening new lines of credit without obtaining prior approval from his supervising probation officer; 2) requiring defendant Gilbert to notify any potential clients, employer, or prospective employer of the pending federal charge as directed by the supervising probation officer; and 3) preventing defendant Gilbert from opening any new clinics and/or raising additional capital or money to fund any clinic related to artificial pancreas treatment.

6. Modification of the defendant's term of pre-trial release is appropriate to "assure the safety of the community," as the defendant is continuing to solicit funds for a business similar to that at issue in the instant indictment.

WHEREFORE, premises considered, the United States respectfully requests this Court grant its Motion to Modify Conditions of Pretrial Release.

Respectfully submitted this 29th day of October, 2018.

LOUIS V. FRANKLIN, SR.  
UNITED STATES ATTORNEY

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such to all counsel of record.

Respectfully submitted,

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**EXHIBIT 1**

**(UNDER SEAL – Final Judgment as to Gregory Gilbert)**

**G. FORD GILBERT**

**2:18-cr-116-MHT-WC**

**EXHIBIT 2**

**(UNDER SEAL – Communication from Timothy J. Galligan, Esq.)**

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